

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

VENTURIST, INC.,

PLAINTIFF,

VS.

PAT MAUNEY,

DEFENDANT.

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CIVIL ACTION NO. 2:06cv494-SRW

AFFIDAVIT OF ELIZABETH DIERLAM

My name is Elizabeth Dierlam. I am over the age of twenty-one (21) years. I have personal knowledge of the following:

I am an officer of Venturist, Inc. I have been with the company for over ten (10) years. I moved from Alabama to Virginia in 2002 and then to Washington state in 2004; however, I remain an officer of Venturist, Inc. I have personal knowledge of many of the circumstances surrounding Pat Mauney's professional relationship with Venturist, Inc., including her work ethic, compensation, overall contributions to the company, and the terms and conditions of her relationship with the company.

It would not be inconvenient for me to travel to Montgomery, Alabama to testify about the material aspects of the relationship between Pat Mauney and Venturist, Inc. I have two small children, and both my husband and I have family in Montgomery, Alabama who could assist with lodging and childcare. Travel to California would be inconvenient for me because I do not have any family in California with whom I could stay or who could help with my children should I have to travel there to testify in this matter. It would be more financially difficult

for me to secure lodging and childcare while in California. Therefore, it would be far more convenient and less financially difficult for me to testify in Montgomery, Alabama than in California.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 28, 2006.

Elizabeth Dierlam
ELIZABETH DIERLAM